

| <b>UNITED STATES BANKRUPTCY COURT</b><br><b>DISTRICT OF NEW JERSEY</b><br><b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>  |  |
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| In re:<br>LTL MANAGEMENT, LLC, <sup>1</sup><br><br>Debtor.  | Chapter 11<br><br>Case No.: 23-12825 (MBK)<br><br>Honorable Michael B. Kaplan  |

<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**AMENDED SEMI-FINAL INTERIM APPLICATION FOR ALLOWANCE OF FEES  
AND REIMBURSEMENT OF EXPENSES TO ANDERSON KILL PC  
FOR THE PERIOD JUNE 1, 2023 THROUGH AUGUST 11, 2023**

TO: THE HONORABLE MICHAEL B. KAPLAN  
UNITED STATES BANKRUPTCY JUDGE

The Application of ANDERSON KILL PC (“Anderson”), Special Insurance Counsel to the Official Committee of Talc Claimants (the “Committee”), respectfully states to the Court as follows:

1. The members and associates of Anderson are all attorneys at law of the State of New York or State of New Jersey.

2. On April 4, 2023, the Debtor filed a Voluntary Chapter 11 Petition in the United States Bankruptcy Court for the District of New Jersey [dkt #1].

3. On April 14, 2023, a Notice of Appointment of the Official Committee of Talc Claimants was entered [dkt #162]. Anderson Kill was retained to serve in the capacity of Special Insurance Counsel to the Official Committee of Talc Claimants by Order of this Court dated July 18, 2023 [dkt #1052], which retention was effective June 1, 2023. A copy of such retention Order is annexed hereto as **Exhibit "A"**.

4. The within Application represents Anderson’s Amended Semi-Final Interim Application as Special Insurance Counsel to the Committee and covers the period June 1, 2023 through August 11, 2023. Pursuant to the August 11, 2023 Dismissal Order, additional fees may be sought for services related to appeals. If such additional fees are sought, an additional final fee application will be filed seeking such fees.

5. Anderson’s computerized time sheets, previously filed with the Monthly Fee Statements covering the Application Period (as referenced below), detail the services rendered by the members and associates of Anderson, the hourly rate charged by each member, associate or paralegal, and the actual time expended in the performance of such services. Said time sheets reflect that

Anderson has expended 317.70 hours in performing services for the Committee, resulting in charges of \$304,955.00. The blended hourly rate charged herein is \$959.88 which your applicant believes is fair and reasonable in light of the nature of the services rendered and the expertise of the professionals rendering such services.

6. Anderson's detailed breakdown of all out-of-pocket disbursements, previously filed with the Monthly Fee Statements covering the Application Period (as referenced below), detail the expenses incurred by Anderson in the performance of its duties as Special Insurance Counsel to the Committee, which total \$280.25.

7. Monthly Fee Statements were prepared and served pursuant to the Administrative Fee Order Establishing Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals, and Modified Order entered on May 22, 2023.

| <b>Date</b>                                  | <b>Fees</b>  | <b>Less 20%</b> | <b>Fee Payment Requested</b> | <b>Expense Reimbursement (100%)</b> |
|--|--------------|-----------------|------------------------------|-------------------------------------|
| <b>06/01/2023-06/30/2023<br/>(Dkt #1136)</b> | \$74,129.50  | (\$14,825.90)   | \$59,303.60                  | \$0.00                              |
| <b>07/01/2023-07/31/2023<br/>(Dkt #1163)</b> | \$155,101.00 | (\$31,020.20)   | \$124,080.80                 | \$176.00                            |
| <b>08/01/2022-08/11/2023<br/>(Dkt #1286)</b> | \$74,085.50  | (\$14,817.10)   | \$59,268.80                  | \$104.25                            |
| <b>08/01/2022-08/11/2023<br/>(Dkt #1393)</b> | \$75,724.50  | (\$15,144.90)   | \$60,579.60                  | \$104.25                            |

8. Annexed hereto and made part of hereof as **Exhibit "B"** is the Amended Affidavit of Robert M. Horkovich, submitted in accordance with the provisions of Section 504 of the Bankruptcy Code.

9. The within fee application encompasses services rendered for the Committee.

10. During the Application period, Anderson Kill:

- a. Prepared for and attended meetings and presentations to the Committee;
- b. Prepared for and made a presentation to the Committee about an assessment of insurance assets available to the estate;
- c. Conferred on multiple occasions with Committee members;
- d. Reviewed and analyzed insurance-related materials;
- e. Reviewed and analyzed case-related materials;
- f. Reviewed and analyzed insurance assets;
- g. Reviewed and organized document productions;
- h. Created insurance coverage charts;
- i. Conducted research relevant to this case; and
- j. Prepared fee applications and relevant documents thereto.

11. In summary, your Applicant has performed an extraordinary amount of varied services in this Chapter 11 case, for the benefit of the thousands of tort claimants in this Chapter 11 case.

12. Your applicant respectfully submits that the services rendered by your Applicant during the period covered by the within Fee Application were reasonable and were of significant benefit to the within bankruptcy estate and its creditors.

13. Your applicant respectfully submits that all services were essential and necessary and the complexity of this Chapter 11 case required such services.

14. In summary, your applicant has performed extensive services, which have benefited the Committee.

**WHEREFORE**, Anderson Kill respectfully requests the entry of the annexed Order, granting an amended semi-final interim allowance of compensation in the amount of \$304,955.00, together with reimbursement of actual out-of-pocket disbursements in the amount of \$280.25, for a total award of \$305,235.25.

Respectfully submitted,

By: /s/ Robert M. Horkovich

Dated: September 22, 2023